



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

August 5, 1992

COPY

Diane M. Leber
Ciba-Geigy Corporation
444 Saw Mill River Road
Ardsley, New York 10502-2699

Re: Ciba-Geigy Cranston Site (Stabilization Work Plan Outline)

Dear Ms. Leber:

I have reviewed the outline for the Stabilization Work Plan (SWP) submitted by you on June 17, 1992, and transmitted verbal comments to your consultant on July 9, 1992. The purpose of this letter is to approve the outline as being equivalent to the outline described in the "Draft Order Modification" dated July 31, 1992, as long as the following comments are incorporated into the outline:

- 1) Should include a general discussion of the performance standard(s) for each interim measure, a discussion of how more detailed performance standards will be developed, and a discussion of when and in what document more detailed performance standards will be submitted.

- 2) Section 6 (project management):

Should include a sub-section on Monthly Progress Reports and should have a sub-section on the final Stabilization Report (for each interim measure).

Should have more detail in the Schedule sub-section to reflect the items listed in the "Proposed Schedule" section of the Order Modification. If an item on the schedule does not have a specific date at the time of submittal of the SWP, then the SWP should identify when and in what document the specific date will be submitted.

- 3) Should include a "Confirmatory Sampling Plan (verification monitoring plan)" for each interim measure.



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There should be a general discussion on how this plan will confirm that the performance standard(s) for each interim measure have or have not been met. There should be a discussion of when and in what document a more detailed plan will be submitted.

As long as you agree to address the above items in the Stabilization Work Plan and since the July 31, 1992 Draft Order Modification is close to being finalized, Ciba-Geigy may begin developing the Stabilization Work Plan.

If you have any questions, I can be reached at (617) 573-9643.

Sincerely,

A handwritten signature in cursive script that reads "Frank Battaglia".

Frank Battaglia, EPA Project Manager

VERIFICATION
MEASUREMENT
PLAN

EPA

COMPARE OUTLINES
←→

CIBA

STAB PLAN

STAB WORK PLAN

- ✓ ① INTRO =
- ✓ ② INT. MEASURE WORK PLAN
- ✓ ③ MNGT PLAN
- ④ CONFIRM PLAN

- ① INTRO =
 - OVERVIEW
 - BACKGROUND
 - SCOPE + OBJ.
 - ASSUMPT

~~EXISTING DATA~~

- ② PHASE II ACT. → NEW DATA (KEY)

- ③ AQUIFER TESTING

- EXISTING DATA/GAPS
- OBJECTIVES
- PRELIM. ACTIVITY
- STEP-DRAWDOWN

- ← AQUIFER DATA ACQUISITION
- PRELIM
- STEP DRAW
- 72 HOUR
- 30 DAY
- 30 DAY SURGE
- DISCHARGE

REF. STANDARDS
EVAL. CRITERIA

SEPT. 1 IN FIELD

* OUTLINE ADDITIONS *

- NO OUTLINE CHANGED SINCE EPA NOT APPROVING
- PREL. CRITERIA - OBJ. ^{S.W. SOIL G.W.} MORE DETAIL IN DESIGN
- CONFIRM SAMPLING PLAN
- PROGRESS REPORTS (MONTHLY)
- MNGT PLAN SCHEDULE
- ORIGIN THROUGH CONCEPT DESIGN
- UNDER SURFACE IN NARRATIVE
- CONCEPTUAL DESIGN & DETAIL SCHEDULE
- STABILIZATION REPORT IN PROJ. MNGT PLAN
- EACH INT. MEASURE

SUMMARY

- ④ G.W. TREAT STUDY

- EXIST DAT/GAPS
- DISCHARGE LIMIT / REMOVA EFFIC.
- CONCEPTUAL DESIGN
- AIR STRIPPING BATCH-SCALE TEST
- " " PILOT TEST
- SUMMARY

- ⑤ H/VAC EXTRACTION PILOT TEST

- EXIST DAT/GAPS
- PILOT TEST
- SUMMARY

- ⑥ PROT MNG ~~PLAN~~ DURING STAB

- SCHEDULE AND DESIGN
- CONTINGENCY
- IMPL
- SUMMARY

PROGRESS REPORTS

- at once {
 - DATA ACQUISITION
 - CONCEPTUAL DESIGN
- TBD @ SUBMITAL OF {
 - FINAL DESIGN
 - IAPL
 - EXPECTED PROF. STAND ACHIEVED
 - REPORT SUBMITTED

TABLE 2

[illegible]